

IN THE CHANCERY COURT OF DAVIDSON COUNTY, TENNESSEE

2011 MAR 24 PM 3:20

DAVIDSON & HASTINGS
C. CHANCERY CT.

Case No. RE 14

11-404-1

BELLE MEADE TOWER
CONDOMINIUM ASSOCIATION,
Plaintiff,

vs.

BRUCE C. ROBINS, ROBINS
INSURANCE AGENCY, INC., and
TRAVELERS INSURANCE COMPANY,
Defendants.

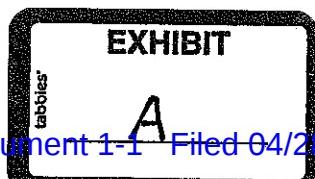
COMPLAINT

COMES NOW the Plaintiff, Belle Meade Tower Condominium Association, and for its complaint against Bruce C. Robins, Robins Insurance Agency, Inc. and Travelers Insurance Company, say and allege:

PARTIES

1. Plaintiff, Belle Meade Tower Condominium Association (hereinafter the "Association"), is a Tennessee unincorporated association formed for the purpose, *inter alia*, of operating, managing, maintaining and administering the affairs of Belle Meade Tower, a condominium, located in Davidson County, Tennessee (hereinafter the "Condominium"). Its members are comprised of the co-owners of residential units within the Condominium, which is a residential condominium complex located at 105 Leake Avenue, Nashville, Davidson County, Tennessee, 37205.

2. Robins Insurance Agency, Inc. is a Tennessee corporation with its principal place of business in Nashville, Davidson County, Tennessee. Robins Insurance Agency, Inc. may be



served with process through its registered agent, Bruce C. Robins, located at 30 Burton Hills Blvd, Nashville, TN 37215.

3. Bruce C. Robins is the President of Robins Insurance Agency, Inc. and is a licensed insurance provider in the State of Tennessee. Bruce C. Robins and Robins Insurance Agency, Inc. are hereinafter collectively referred to as "Robins". Bruce C. Robins may be served with process at 30 Burton Hills Blvd, Nashville, TN 37215.

4. Travelers Insurance Company (hereinafter "Travelers") is an insurance company which issued flood insurance to the Association insuring the Condominium. Travelers may be served with process through its registered agent, the Department of Commerce and Insurance – Commissioner, located at 500 James Robertson Parkway, 5th Floor, Nashville, TN 37243.

JURISDICTION AND VENUE

5. This Court has jurisdiction over this dispute and the parties. The acts, practices, and conduct complained of occurred in Davidson County, Tennessee and thus venue lies in this Court.

FACTS

The Insurance Policy

6. In 2004, the Association contacted Robins in order to secure a flood insurance policy for the Condominium.

7. Robins developed, recommended, negotiated and procured a Standard Flood Insurance Policy ("SFIP") for the Association issued through Travelers. The policy procured by Robins was policy number 6004976756 (hereinafter the "Original Policy") and is attached hereto as Exhibit 1.

8. The policy developed, recommended, negotiated and procured by Robins

provided for \$500,000.00 in building insurance coverage and \$10,000.00 in content insurance coverage.

9. The Original Policy was renewed annually without issue up to and after the historic May 2010 Flood (the "Flood") that occurred in Davidson and surrounding counties in Tennessee.

The May 2010 Flood

10. The Flood caused hundreds of thousands of dollars of damage to the Condominium and to its residents. The damages affected all of the residents and forced them to go without the use of hot water, heat, the guest rooms and the elevators in their building.

11. As of February 18, 2011, Plaintiff's losses associated with the Flood at the Condominium are \$754,013.77.

12. On May 3, 2010, the Association notified Robins that the Condominium had sustained severe damage as a result of the Flood.

Events After the Flood

13. On July 7, 2010, Robins notified the Association that the Original Policy had been incorrectly written on a General Property Form SFIP which provided no coverage for the Condominium.

14. Page 1 of the General Property Form SFIP states that the policy provides no coverage for a residential condominium building. Page 3 of the Residential Condominium Building Association Policy form (hereinafter "RCBAP") states that the policy covers only a residential condominium building in a regular program community. Thus, the Original Policy should have been written on a RCBAP form.

15. On or about July 15, 2010, Robins wrote Travelers and stated that the full policy

limit of the Original Policy should be paid immediately to the Association. Robins confirmed that the Association had purchased the policy in good faith and renewed it continuously for six years. A copy of the July 15, 2010 letter is attached hereto as Exhibit 2.

16. On or about August 30, 2010, Travelers advised the Association that it had cancelled the Original Policy and stated that the cancellation occurred because a General Property Form cannot be used to insure a residential condominium building. A copy of the August 30, 2010 letter is attached hereto as Exhibit 3. The Flood General Policy Cancellation of the Original Policy for the 05/07/2010 to 05/07/2011 policy period, cancellation effective 05/07/2009, is attached hereto as Exhibit 4.

17. On August 30, 2010, Travelers also advised the Association that a rewritten policy using the correct RCBAP form had been issued for the Association. The second policy, written for the 05/07/2009 to 05/07/2010 and 05/07/2010 to 05/07/2011 policy periods, is policy number 6010243059 (collectively hereinafter the "Second Policy") and is attached hereto as Exhibit 5.

18. In accordance with the Federal Emergency Management Agency (hereinafter "FEMA") requirements, the coverage was rewritten to match the amount of coverage that was originally requested for the Condominium. Therefore, the Second Policy once again provided for \$500,000.00 in building insurance coverage and \$10,000.00 in contents coverage.

19. The Association did not request the cancelation of the Original Policy. The coverage terms of the Second Policy were never discussed with the Association.

20. On September 16, 2010, the Association submitted their Proof of Loss ("Proof of Loss") for flood damage to the Condominium in the amount of \$746,958.12.

21. On September 30, 2010, Travelers issued their denial letter and rejected the

Association's claim.

22. As stated in the denial letter, Travelers had determined that the Second Policy allowed them to issue payment of \$525,743.65 for the damages sustained by the Condominium. However, the Association was heavily penalized under the Coinsurance section for only maintaining \$500,000.00 in building insurance coverage and the final amount declared payable by Travelers, after taking the penalty and deductible into account, was \$33,285.41.

23. On October 11, 2010, the Association appealed the denial of the Proof of Loss to FEMA.

24. On January 18, 2011, FEMA denied the Association's appeal stating that Robins had purchased the wrong policy for the Association and had failed to provide the information needed to properly issue the appropriate policy.

COUNT I

Failure to Procure – Robins

25. Plaintiff incorporates by reference paragraphs 1-24 as if set forth fully herein.

26. As the Association's broker of record, Robins had a duty as a matter of law to perform services for the Association using the skill and judgment required by professionals in Robins' business and the Association relied on Robins to do so.

27. The Association understood and expected that the policy developed, recommended, negotiated and procured by Robins for the Association was the required coverage necessary to protect the Condominium in the event of a flood.

28. The Association understood and expected that the \$500,000.00 in building coverage and \$10,000.00 in content developed, recommended, negotiated and procured by Robins for the Association was the coverage required to protect the Condominium in the event of

a flood.

29. Plaintiff relied on the express representations by Robins that their policy would provide the necessary coverage to protect the Condominium in the event of a flood.

30. Plaintiff further relied on the express representations by Robins that \$500,000.00 in building coverage and \$10,000.00 in content coverage was the required coverage necessary to protect the Condominium in the event of a flood.

31. The Original Policy was cancelled and the Association was not properly insured for the damages caused by the Flood. Furthermore, as noted by the Coinsurance penalty, the coverage amounts selected by Robins were inadequate for purposes of insuring the Condominium. Therefore, Robins failed to develop, recommend, negotiate and/or procure flood insurance for the Association as directed.

32. Robins is liable to Plaintiff for Plaintiff's losses associated with the Flood.

COUNT II

Negligent Misrepresentation – Robins and/or Travelers

33. Plaintiff incorporates by reference paragraphs 1-32 as if set forth fully herein.

34. Robins had a duty as a matter of law to perform services for the Association using the skill and judgment required by professionals in Robins' business. Travelers had a duty to accurately represent the coverage afforded by the policy.

35. The Association understood and expected that the insurance developed, recommended, negotiated and procured by Defendants for the Association would provide the required coverage necessary to protect the Condominium in the event of a flood.

36. The Association purchased the flood insurance from Travelers, based on the recommendation and advice of the Defendants.

37. Plaintiff relied on the express representations by Defendants that the Original Policy would provide the necessary coverage to protect the Condominium in the event of a flood.

38. Plaintiff further relied on the express representations by Defendants that \$500,000.00 in building coverage and \$10,000.00 in content coverage was the required coverage necessary to protect the Condominium in the event of a flood.

39. The Original Policy developed, recommended, negotiated and procured by Defendants did not provide coverage for a residential condominium building and was canceled for this reason after the Flood.

40. To date, Plaintiff's losses associated with the Flood are \$754,013.77.

41. Defendants negligently misrepresented to the Plaintiff that this flood policy would protect the Condominium in the event of a flood, and sold Plaintiff that insurance, which in fact would not protect the Condominium in the event of a flood.

42. Defendants are liable to Plaintiff for Plaintiff's losses associated with the May Flood and/or Defendants breached their duty not to misrepresent the coverage afforded by the policy.

WHEREFORE, premises considered, Plaintiff requests the following relief:

1. That proper process issue and be served upon the Defendants and that the Defendants be required to answer this Complaint;
2. Judgment in Plaintiff's favor against Robins in an amount to be proven at trial sufficient to compensate Plaintiff for their losses and damages caused by Robins' failure to procure flood insurance as directed;
3. Judgment in Plaintiff's favor against Travelers and Robins in an amount to be proven at trial sufficient to compensate Plaintiff for their losses and damages caused by Travelers and Robins' negligent misrepresentations;
4. That Plaintiff be awarded costs and reasonable attorney's fees against the Defendants;
5. That Plaintiff be awarded pre-judgment and post-judgment interest;
6. That all costs of this action be taxed to the Defendants; and
7. For any and all other such relief either in law or equity as the Court may deem just and appropriate.

Respectfully Submitted,

J. David Wicker, Jr. No. 23960
W. Lee Corbett, P.C. No. 2554
CORBETT CROCKETT
3100 West End Avenue, Suite 1050
Nashville, Tennessee 37203
(615) 383-0500

Attorneys for the Plaintiff

PO Box 34272 Bethesda, MD 20827
800-356-6670

The Standard Fire Insurance Company

STANDARD POLICY

EFFECTIVE AT 12:01 AM 05/07/2004 TO 05/07/2005
NEW POLICY DECLARATIONS

POLICY NUMBER: 6004976756

PAYER: INSURED

NAMED INSURED AND MAILING ADDRESS:
BELLE MEADE CONDO ASSOCIATION

FIRST MORTGAGEE / LENDER NAME:

105 LEAKE AVE
NASHVILLE TN 37205

LOAN NUMBER:

INSURED PROPERTY ADDRESS:
105 LEAKE AVE
NASHVILLE TN 37205

SECOND MORTGAGEE / LENDER NAME:

AGENT NAME AND ADDRESS:
ROBINS INSURANCE AGENCY INC
30 BURTON HLLS BLVD, #300
PO BOX 15047
NASHVILLE TN 37215

LOAN NUMBER:

OTHER MORTGAGEE / LENDER NAME:

615-665-9200

LOAN NUMBER:

PROPERTY DESCRIPTION

BUILDING:
THREE OR MORE FLOORS WITH NO BASEMENT
NON-RESIDENTIAL NOT SMALL BUSINESS
NON ELEVATED BUILDING

CONTENTS:
NON-RESIDENTIAL CONTENTS LOCATED
ON FIRST FLOOR ONLY

RATING INFORMATION

PROGRAM: REGULAR
ZONE: AE
YEAR BUILT OR
SUBSTANTIALLY IMPROVED: PRIOR 06/15/1982

COMMUNITY NAME: NASHVILLE, CITY OF & DAVIDSC
COMMUNITY NUMBER: 470040
COMM. RATING DISCOUNT: 05%
ELEVATION DIFFERENCE:

AMOUNTS OF INSURANCE

	BASIC COVERAGE	RATE	PREMIUM	ADDITIONAL COVERAGE	RATE	PREMIUM	TOTAL PREMIUM
BUILDING:	\$150,000 X .00.83	=	\$1,245.00	\$350,000 X .00.60	=	\$2,100.00	\$3,345.00
CONTENTS:	\$10,000 X .01.62	=	\$162.00	\$0 X .00.51	=	\$0.00	\$162.00
TOTAL BUILDING COVERAGE:	\$500,000			SUBTOTAL:	\$	3,507.00	
BUILDING DEDUCTIBLE:	\$10,000			OPTIONAL DEDUCTIBLE ADJUSTMENT:	\$	701.00	
TOTAL CONTENTS COVERAGE:	\$10,000			COMMUNITY DISCOUNT:	\$	143.00	
CONTENTS DEDUCTIBLE:	\$10,000			PROBATION SURCHARGE:	\$	0.00	
				EXPENSE CONSTANT:	\$	0.00	
				INCREASED COST OF COMPLIANCE PREMIUM:	\$	60.00	
				TOTAL WRITTEN PREMIUM:	\$	2,723.00	
				FEDERAL POLICY SERVICE FEE:	\$	30.00	
				TOTAL PREMIUM PAID:	\$	2,753.00	

PLEASE REFER TO THE GENERAL PROPERTY POLICY FORM FOR A FULL EXPLANATION OF COVERAGES

PREMIUM INCLUDES COVERAGES FOR ICC AS OF JUNE 1, 1997.



TRAVELERS FLOOD INSURANCE PROGRAM
PO BOX 34272, BETHESDA, MD 20827-0272

01 OF 01

BELL MEADE CONDO ASSOCIATION

105 LEAKE AVE
NASHVILLE TN 37205-3710

THIS ENDORSEMENT CHANGES THE POLICY. PLEASE READ CAREFULLY.

**STANDARD FLOOD INSURANCE POLICY
ENDORSEMENT**

Effective May 1, 2003

This Endorsement replaces Paragraph 2, Coverage D - Increased Cost of Compliance, III - Property Covered of the Dwelling, General Property, and Residential Condominium Building Association Policies with the following paragraph.

2. Limit of Liability

We will pay you up to \$30,000 under this Coverage D - Increased Cost of Compliance, which only applies to policies with building coverage (Coverage A). Our payment of claims under Coverage D is in addition to the amount of coverage which you selected on the application and which appears on the Declarations Page.

But the maximum you can collect under this policy for both Coverage A - Building property and Coverage D - Increased Cost of Compliance cannot exceed the maximum permitted under the Act. We do not charge a separate deductible for a claim under Coverage D.



Robins Insurance Agency, Inc.

30 Burton Hills Blvd. • Suite 300 • P.O. Box 150437 • Nashville, TN 37215
Phone: (615) 665-9200 • Fax: (615) 665-9207 • E-mail: Insurance@robinsins.com • www.robinsins.com

July 15, 2010

Ms. Jacki Stockton
Ms. Beth Williams
Travelers Insurance Company

Re: Belle Meade Tower Condo Association

Dear Jacki and Beth:

The full policy limit of \$500,000 for this flood claim should be paid immediately, and I will explain this clearly. The estimated damages exceed \$700,000.

The questions raised concerning our use of the non residential policy form and the policy provisions on page 12 of the policy regarding reformation of coverage are not relevant to the need for swift resolution on behalf of our client.

The engineering report due you next week will simply determine if we used the wrong policy form back in early 2004. After our numerous conversations this week directly with FEMA and CSC, I have no idea what the answer might be.

But, suppose the report indicates we should have used a different policy form, then you must go to page 12 for reformation. The policy clearly does not address this situation no matter how many times you may read it over and over.

After you remit to our client the \$500,000, you can recalculate the difference in what the settlement would have been under the other policy form with coinsurance provisions, and come to my agency for the difference. Our E & O carrier will not have a problem defending us, but that is another matter for another day.

You cannot alter the policy issued and renewed for six years continuously when there was no change in the risk. Neither Travelers nor FEMA can get away with that. Nothing on page 12 or anywhere else in the policy allows you to amend the policy provisions.

The engineering report and all the conversations with all the people at CSC and Travelers is an exercise in CYA, which I can appreciate in a large organization. But, it is time to take responsibility and get this claim paid now.



Belle Meade Tower purchased a policy in good faith and I stand behind them all the way. If Travelers or FEMA think our agency made any mistakes, then the process allows us to settle that separately from the payment to our client.

Let's do the right thing and settle this today. Please call me promptly upon your review. Thank you.

Sincerely,
Robins Insurance Agency, Inc.


Bruce C. Robins, CPCU, ARM, CIC
President



Chantal Cyr
Vice President
Travelers
(860)756-1840 (phone)
(800)382-6235 (fax)

One Tower Square, 9PBA
Hartford, CT 06183

August 30, 2010

Robins Insurance Agency
Attention: Bruce C. Robins, President
30 Burton Hills Blvd.
Suite 300
Nashville, Tennessee 37215

RE: Belle Meade Condominium Association
Policy Number: 6004976756
Date of Loss: 5/2/2010

Bruce,

Given the complexities and series of events that have occurred relating to the flood insurance claim made by Belle Meade Condominium under their Standard Flood Insurance Policy, we are providing you with this summary.

The Standard Fire Insurance Company "Standard Fire" is a Write Your Own "WYO" insurer in the federal government's National Flood Insurance Program "NFIP" and as such, is the Fiscal Agent of the federal government. The NFIP's Standard Flood Insurance Policy, which is federal regulation, and all disputes arising from the handling of any claim under such policy are governed exclusively by the flood insurance regulations promulgated by FEMA, the National Flood Insurance Act of 1968, as amended (42 U.S.C., et seq.) and Federal Common Law. This is important to note because Standard Fire, like all other WYO insurers are bound by the requirements imposed on it by FEMA. Standard Fire does not draft the insurance contract nor does it create the rules of implementation rather, Standard Fire must, by contractual obligation and as the Fiscal Agent of the government, strictly adhere to the SFIP and rules imposed on it by FEMA.

When Standard Fire received the insurance application for Belle Meade, the application stated the building was nonresidential and the estimated replacement cost was \$500,000. Based upon this information a Standard Flood Insurance Program General Property Policy was issued pursuant to the NFIP. This policy also provided coverage for association-owned personal property in the amount of \$10,000.



Standard Fire received notice of the flood loss that occurred on 5/2/2010. It was not until after Belle Meade suffered a loss on 5/2/2010 did Standard Fire know that the information relied upon by it to rate and issue the policy was incorrect. This occurred when Standard Fire sent an independent adjuster to the location to assess the damages. Upon inspection, the independent adjuster determined the property was actually one building which was a residential condominium with 10 floors devoted to residential units and an attached parking garage. Because the agent, Bruce Robins disagreed with this decision and because there would be an enormous impact on the claim, Standard Fire sent out an engineer to the location to see if there was any way to consider this building anything other than a residential condominium. The engineer came up with the same result.

Under the NFIP, a General Property Policy cannot be used to insure a residential condominium building. Because the incorrect information was identified only after a loss was filed, the policy provides for reformation to the correct policy form, here it would be a Residential Condominium Building Association Policy (RCBAP). The rules of the NFIP require us to cancel the existing policy and apply those premiums to re-write the coverage to the correct policy form at the same limits as the expiring policy for the current year and the prior year term. Standard Fire is not allowed under the rules of the program to use any overpayments in premium to purchase additional insurance to reduce the co-insurance penalty.

Because Standard Fire is not able to deviate from the rules of the NFIP, Standard Fire presented a request to FEMA to waive provisions of the SFIP so that the insured could receive an amount closer to the \$500,000. FEMA denied our waiver request. As a follow up, FEMA has stated if the insured requests, FEMA will consider reformation of the policy back 6 years, beyond the current and prior year reformation outlined above. This would result in a possible additional premium refund for those years.

The current and prior year policy reformation has occurred and the current and prior term premium has been refunded to the customer. The claim has been adjusted, however, we have not yet received a signed and sworn proof of loss from the insured. The insured may submit their own signed and sworn proof and Standard Fire can pay the undisputed amount on that proof of loss or, the insured can sign one prepared by the independent adjuster. Regardless of who prepares the proof, in accordance with the SFIP, a proof of loss is required in order for any claim to be paid under the NFIP. Because we are now beyond the timeframe for submitting the proof under the program rules, we will submit a waiver request to FEMA on behalf of the policyholder. Given the current posture of this dispute, please submit that Proof to Standard Fire's counsel via counsel representing the condo association.

Among other options and rights available to the insured is the right to seek an appeal of any FEMA waiver denial directly through FEMA. We would also suggest that you provide council

to your client with respect to this policy and the limits that are necessary to provide them with adequate coverage in the future.

Respectfully,

Chantal M Cyr

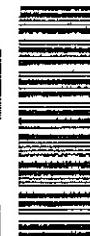


Insurer: The Standard Fire Insurance Company
 Flood Service Center PO Box 29103
 Shawnee Mission, KS 66201-1403

Policy Number
6004976756

FLOOD GENERAL POLICY CANCELLATION

222500



Named Insured and Mailing Address: BELLE MEADE CONDO ASSOCIATION 105 LEAKE AVE NASHVILLE, TN 37205-3710	Policy Period: 05/07/2010 to 05/07/2011 Policy Term: ONE YEAR CANCELLATION EFFECTIVE: 05/07/2009
Payor: INSURED	Agent No: 0F5881 ROBINS INSURANCE AGENCY INC PO BOX 150437 NASHVILLE, TN 37215 Agent Phone: 615-665-9200

The building covered by this policy is located at the above mailing address unless otherwise stated below.

RATING DESCRIPTION	
Property/Building	Contents Location
NON-RESIDENTIAL THREE OR MORE FLOORS NO BASEMENT	LOWEST FLOOR ONLY ABOVE GROUND LEVEL Subject to, III. Property Covered, Paragraph B.

Date of construction or substantial improvement was on 01/01/1965

LOCATION INFORMATION

Community Name: NASHVILLE & DAVIDSON COUNTY, CITY OF* No: 4700400326F

Status: REGULAR CRS Class: 8 FIRM Zone: AE Elevation Difference: Grandfathered:

COVERAGE AND RATING INFORMATION						
Coverage Type	Coverage Limit	Deductible	Rate	Deductible Adjustment	Premium	
Building	\$ 500,000	\$10,000	00.83/01.13	\$ -743.00	\$ 4,383.00	
Contents	\$ 10,000	\$10,000	01.62/01.01	\$ -23.00	\$ 139.00	
				ICC PREMIUM	\$ 60.00	
				FEDERAL POLICY FEE	\$ -75.00	
				PREMIUM REFUND	\$ -7,963.00	
				TOTAL PREMIUM	\$ -7,963.00	

THIS IS NOT A BILL

Policy Changes:

CANCELLATION - 22. CANCEL/REWRITE DUE TO

Attachments:

FIRST MORTGAGEE

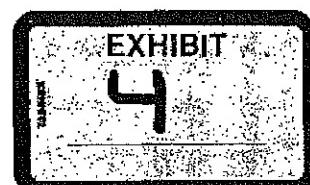
SUNTRUST MORTGAGE INC ISAOA
 PO BOX 57028
 IRVINE, CA 92619-7028
 LOAN NUMBER: 0021729504

Issue Date: 07/28/2010

Insured Copy

Your Insurer Is The Standard Fire Insurance Company, One Tower Square, Hartford, CT 06183

For information about how Travelers compensates independent agents and brokers, please visit www.Travelers.com or call our toll free telephone number 1-866-904-8348. You may also request a written copy from Marketing at One Tower Square, 2GSA, Hartford, Connecticut 06183.





Insurer: The Standard Fire Insurance Company
 Flood Service Center PO Box 29103
 Shawnee Mission, KS 66201-1403

Policy Number
 6010243059

740600

FLOOD RESIDENTIAL CONDO BUILDING ASSOCIATION POLICY DECLARATION - RENEWAL

Named Insured and Mailing Address: BELLE MEADE CONDO ASSOCIATION 105 LEAKE AVE NASHVILLE, TN 37205-3710	Policy Period: 05/07/2009 to 05/07/2010 Policy Term: ONE YEAR
Payor: INSURED	Agent No: 0F5881 ROBINS INSURANCE AGENCY INC PO BOX 150437 NASHVILLE, TN 37215 Agent Phone: 615-665-9200

The building covered by this policy is located at the above mailing address unless otherwise stated below.

RATING DESCRIPTION	
Property/Building	Contents Location
OTHER RESIDENTIAL THREE OR MORE FLOORS NO BASEMENT HIGH RISE CONDOMINIUM 61 UNITS	LOWEST FLOOR ONLY ABOVE GROUND LEVEL AND HIGHER FLOORS Subject to, III. Property Covered, Paragraph B.

REPLACEMENT COST: \$9,723,688

Date of construction or substantial improvement was on 01/01/1965

LOCATION INFORMATION	
Community Name: NASHVILLE & DAVIDSON COUNTY, CITY OF*	No: 4700400326F
Status: REGULAR CRS Class: 8 FIRM Zone: AE Elevation Difference:	

COVERAGE AND RATING INFORMATION						
Coverage Type	Coverage Limit	Deductible	Rate	Deductible Adjustment	Premium	
Building	\$ 500,000	\$10,000	00.85/00.19	\$ -310.00	\$ 1,630.00	
Contents	\$ 10,000	\$10,000	00.96/00.97	\$ -15.00	\$ 81.00	
			ICC PREMIUM		\$ 75.00	
			ANNUAL SUBTOTAL		\$ 1,786.00	
			CRS DISCOUNT		\$ -179.00	
			FEDERAL POLICY FEE		\$ 735.00	
			TOTAL PREMIUM		\$ 2,342.00	

THIS IS NOT A BILL

Policy Changes:

Attachments:
FD0004 (05-03)

FIRST MORTGAGEE

SUNTRUST MORTGAGE INC ISAOA
PO BOX 57028
IRVINE, CA 92619-7028

LOAN NUMBER: 0021729504

Issue Date: 07/29/2010

Insured Copy

Your Insurer Is The Standard Fire Insurance Company, One Tower Square, Hartford, CT 06183

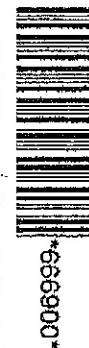
For information about how Travelers compensates independent agents and brokers, please visit www.Travelers.com or call our toll free telephone number 1-866-904-8348. You may also request a written copy from Marketing at One Tower Square, 2GSA, Hartford, Connecticut 06183.





Insurer: The Standard Fire Insurance Company
 Flood Service Center PO Box 29103
 Shawnee Mission, KS 66201-1403

Policy Number
 6010243059



FLOOD RESIDENTIAL CONDO BUILDING ASSOCIATION POLICY DECLARATION - RENEWAL

Named Insured and Mailing Address: BELLE MEADE CONDO ASSOCIATION 105 LEAKE AVE NASHVILLE, TN 37205-3710	Policy Period: 05/07/2010 to 05/07/2011 Policy Term: ONE YEAR
Payor: INSURED	Agent No: 0F5881 ROBINS INSURANCE AGENCY INC PO BOX 150437 NASHVILLE, TN 37215 Agent Phone: 615-665-9200

The building covered by this policy is located at the above mailing address unless otherwise stated below.

RATING DESCRIPTION

Property/Building	Contents Location
OTHER RESIDENTIAL THREE OR MORE FLOORS NO BASEMENT HIGH RISE CONDOMINIUM 61 UNITS	LOWEST FLOOR ONLY ABOVE GROUND LEVEL AND HIGHER FLOORS Subject to, III. Property Covered, Paragraph B.

REPLACEMENT COST: \$9,723,688

Date of construction or substantial improvement was on 01/01/1965

LOCATION INFORMATION

Community Name: NASHVILLE & DAVIDSON COUNTY, CITY OF No: 4700400326F

Status: REGULAR CRS Class: 8 FIRM Zone: AE Elevation Difference: Grandfathered:

COVERAGE AND RATING INFORMATION					
Coverage Type	Coverage Limit	Deductible	Rate	Deductible Adjustment	Premium
Building	\$ 500,000	\$10,000	00.95/00.21	\$ -304.00	\$ 1,867.00
Contents	\$ 10,000	\$10,000	00.96/00.71	\$ -13.00	\$ 83.00
			ICC PREMIUM		\$ 75.00
			ANNUAL SUBTOTAL		\$ 2,025.00
			CRS DISCOUNT		\$ -203.00
			FEDERAL POLICY FEE		\$ 840.00
TOTAL PREMIUM					\$ 2,662.00

THIS IS NOT A BILL

Policy Changes:

Attachments:
FD0004 (05-03)

Issue Date: 07/30/2010

Agent Copy

Your Insurer Is The Standard Fire Insurance Company, One Tower Square, Hartford, CT 06183

For information about how Travelers compensates independent agents and brokers, please visit www.Travelers.com or call our toll free telephone number 1-866-904-8348. You may also request a written copy from Marketing at One Tower Square, 2GSA, Hartford, Connecticut 06183.

STATE OF TENNESSEE
DEPARTMENT OF COMMERCE AND INS.
500 JAMES ROBERTSON PARKWAY
NASHVILLE, TENNESSEE 37243

7010 2780 0001 2571 2382

SEARCHED
INDEXED
SERIALIZED
FILED
APR 28 2011
KNOXVILLE
TENNESSEE

7010 2780 0001 2571 2382 04/04/2011
METLIFE INSURANCE CO OF CONNECTICUT
800 S. GAY STREET, STE 2021, % C T CORP.
KNOXVILLE, TN 37929-0710



C O R P O R A T I O N S E R V I C E C O M P A N Y®

Notice of Service of Process

S1C / ALL

Transmittal Number: 8625978
Date Processed: 04/11/2011

Primary Contact: Pamela Hoff
The Travelers Companies, Inc.
385 Washington Street, MC 515A
Saint Paul, MN 55102

Entity: The Standard Fire Insurance Company
Entity ID Number 2317464

Entity Served: The Standard Fire Insurance Company

Title of Action: Belle Meade Tower Condominium Association vs. Bruce C. Robins

Document(s) Type: Summons/Complaint

Nature of Action: Contract

Court/Agency: Davidson County Chancery Court, Tennessee

Case/Reference No: 11-404-IV

Jurisdiction Served: Tennessee

Date Served on CSC: 04/11/2011

Answer or Appearance Due: 30 Days

Originally Served On: Travelers

How Served: Client Direct

Sender Information: J. David Wicker, Jr.
615-383-0500

Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

To avoid potential delay, please do not send your response to CSC
CSC is SAS70 Type II certified for its Litigation Management System.
2711 Centerville Road Wilmington, DE 19808 (888) 690-2882 | sop@cscinfo.com

③ CT Corporation

Service of Process Transmittal 04/07/2011 CT Log Number 518317752

TO: Kalper Wilson
MetLife
1095 Avenue of the Americas
New York, NY 10036-4746

RE: Process Served in Tennessee

FROM: MetLife Insurance Company of Connecticut (Domestic State: CT)

ENCLOSURE AND COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: Belle Meade Tower Condominium Association, PLLC, vs. Bruce C. Robins, et al., Dfts.
// b; MetLife Insurance Co of Connecticut
None discrepancy noted.

DOCUMENT(S) SERVED: Letter, Summons, Return Form, Complaint, Exhibit(s)

COURT/AGENCY: Davidson County Chancery Court, TN
Case # 11-4041V

NATURE OF ACTION: Insurance Litigation - Policy benefits claimed for property damage as a result of flood on 5/3/10

ON WHOM PROCESS WAS SERVED: CT Corporation System, Knoxville, TN

DATE AND HOUR OF SERVICE: By Certified Mail on 04/07/2011 postmarked on 04/04/2011

JURISDICTION SERVED: Tennessee

APPEARANCE OR ANSWER DUE: Within 30 days from the date this summons is served upon you

ATTORNEY(S) / ATTORNEY(S) OF RECORD: J. David Wicker, Jr.
Corbett Crockett
3100 West End Avenue
Suite 1050
Nashville, TN 37203
615-363-0500

REMARKS: Papers were served by the Department of Commerce and Insurance on 3/28/11.

ACTION ITEM: CT has received the current log, Recdn Date: 04/07/2011, Expected Purge Date: 04/12/2011
Image SOP
Email Notification: CTServiceofProcess.custerv@processmetlife.com

SIGNED: CT Corporation System
PER: Amy McLaren
ADDRESS: 800 E. Gay Street
Suite 0221
Knoxville, TN 37929-4710
TELEPHONE: 865-522-9023

Page 1 of 1 / WT

Information displayed on this transmittal is for CT Corporation's record keeping purposes only and is provided to the recipient for quick reference. This information does not constitute a legal opinion as to the nature of action, the amount of damages, the potential issue, or any other legal questions in the documents themselves. Recipient is responsible for retaining and properly and for taking appropriate action. Signatures on certified mail receipts confirm receipt of package with no

STATE OF TENNESSEE
Department of Commerce and Insurance
500 James Robertson Parkway
Nashville, TN 37243-1131
PH - 615.532.5260, FX - 615.532.2788
brenda.meade@tn.gov

April 4, 2011

Metlife Insurance Co Of Connecticut
800 S. Gay Street, Ste 2021, % C T Corp.
Knoxville, TN 37929-9710
NAIC # 87726

Certified Mail
Return Receipt Requested
7010 2780 0001 2571 2382
Cashier # 2559

Re: Belle Meade Tower Condo. Asso. V. Metlife Insurance Co Of Connecticut
Docket # 11-404-I V

To Whom It May Concern:

Pursuant to Tennessee Code Annotated § 56-2-504 or § 56-2-506, the Department of Commerce and Insurance was served March 30, 2011, on your behalf in connection with the above-styled proceeding. Documentation relating to the subject is herein enclosed.

Brenda C. Meade
Designated Agent
Service of Process

Enclosures

cc: Chancery Court Clerk
Davidson County
One Public Square, Suite 308
Nashville, Tn 37201

STATE OF TENNESSEE 20 TH JUDICIAL DISTRICT CHANCERY COURT	SUMMONS	CASE FILE NUMBER <i>11-404-TK</i>
PLAINTIFF BELLE MEADE TOWER CONDOMINIUM ASSOCIATION	DEFENDANT BRUCE C. ROBINS, ROBINS INSURANCE AGENCY, INC., and TRAVELERS INSURANCE COMPANY	
TO: (NAME AND ADDRESS OF DEFENDANT)		Method of Service:
TRAVELERS INSURANCE COMPANY, with service through Department of Commerce and Insurance - Commissioner 500 James Robertson Parkway, 5 th Floor Nashville, TN 37243		<input type="checkbox"/> G Certified Mail <input type="checkbox"/> G Davidson Co. Sheriff <input type="checkbox"/> G *Comm. Of Insurance <input type="checkbox"/> G *Secretary of State <input type="checkbox"/> G *Out of County Sheriff <input type="checkbox"/> G Private Process Server <input type="checkbox"/> G Other
List each defendant on a separate summons. YOU ARE SUMMONED TO DEFEND A CIVIL ACTION FILED AGAINST YOU IN CHANCERY COURT, DAVIDSON COUNTY, TENNESSEE. YOUR DEFENSE MUST BE MADE WITHIN THIRTY (30) DAYS FROM THE DATE THIS SUMMONS IS SERVED UPON YOU. YOU MUST FILE YOUR DEFENSE WITH THE CLERK OF THE COURT AND SEND A COPY TO THE PLAINTIFF'S ATTORNEY AT THE ADDRESS LISTED BELOW. IF YOU FAIL TO DEFEND THIS ACTION BY THE ABOVE DATE, JUDGMENT BY DEFAULT CAN BE RENDERED AGAINST YOU FOR THE RELIEF SOUGHT IN THE COMPLAINT.		
Attorney for plaintiff or plaintiff if filing Pro Se: (Name, address & telephone number) J. David Wicker, Jr. W. Lee Corbett CORBETT CROCKETT 3100 West End Avenue, Suite 1050 Nashville, Tennessee 37203 (615) 383-0500	FILED, ISSUED & ATTESTED <i>JW</i> MAR 24 2011 CRISTI SCOTT, Clerk and Master By: 1 Public Square Suite 308 Nashville, TN 37201 Deputy Clerk & Master	
NOTICE OF DISPOSITION DATE		
<p>The disposition date of this case is twelve months from date of filing. The case must be resolved or set for trial by this date or it will be dismissed by the Court for failure to prosecute pursuant to T.R.C.P. 41.02 and Local Rule 18.</p> <p>If you think the case will require more than one year to resolve or set for trial, you must send a letter to the Clerk and Master at the earliest practicable date asking for an extension of the disposition date and stating your reasons. Extensions will be granted only when exceptional circumstances exist.</p>		
TO THE SHERIFF:	DATE RECEIVED	
	Sheriff	

***Submit one original plus one copy for each defendant to be served.

ADA Coordinator, Cristi Scott (862-5710)

RETURN ON SERVICE OF SUMMONS

I hereby return this summons as follows: (Name of Party Served) _____

Served _____
 Not Served _____

Not Found _____
 Other _____

DATE OF RETURN:

By:

Sheriff or other authorized person to serve process

RETURN ON SERVICE OF SUMMONS BY MAIL

I hereby certify and return that on the _____ day of _____, 20____ I sent, postage prepaid, by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in case _____ to the defendant _____. On the _____ day of _____, 20____, I received the return receipt, which had been signed by _____ on the _____ day of _____, 20____.

The return receipt is attached to this original summons to be filed by the Chancery Court Clerk & Master.

Sworn to and subscribed before me on this _____ day of _____, 20____.

Signature of _____ Notary Public or _____ Deputy Clerk

Signature of plaintiff, plaintiff's attorney or other person authorized by statute to serve process.

My Commission Expires:

NOTICE OF PERSONAL PROPERTY EXEMPTION

TO THE DEFENDANT(S):

Tennessee law provides a ten thousand dollar (\$10,000.00) debtor's equity interest personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

ATTACH
RETURN
RECEIPT
HERE
(IF APPLICABLE)

Mail list to: Clerk & Master
1 Public Square
Suite 308
Nashville TN 37201

Please state file number on list.

CERTIFICATION (IF APPLICABLE)

I, Cristi Scott, Clerk & Master of the Chancery Court in the State of Tennessee, Davidson County, do certify this to be a true and correct copy of the original summons issued in this case.

Cristi Scott, Clerk & Master

By:

D.C. & M.

STATE OF TENNESSEE 20 TH JUDICIAL DISTRICT CHANCERY COURT	SUMMONS	CASE FILE NUMBER <i>11-404-11</i>
PLAINTIFF BELLE MEADE TOWER CONDOMINIUM ASSOCIATION	DEFENDANT	ORIGINAL
TO: (NAME AND ADDRESS OF DEFENDANT)		Method of Service:
BRUCE C. ROBINS 30 Burton Hills Blvd Nashville, TN 37215		<input type="checkbox"/> Certified Mail <input type="checkbox"/> Davidson Co. Sheriff <input type="checkbox"/> *Comm. Of Insurance <input type="checkbox"/> *Secretary of State <input type="checkbox"/> *Out of County Sheriff <input type="checkbox"/> Private Process Server <input type="checkbox"/> Other
List each defendant on a separate summons. *Attach Required Fees		
YOU ARE SUMMONED TO DEFEND A CIVIL ACTION FILED AGAINST YOU IN CHANCERY COURT, DAVIDSON COUNTY, TENNESSEE. YOUR DEFENSE MUST BE MADE WITHIN THIRTY (30) DAYS FROM THE DATE THIS SUMMONS IS SERVED UPON YOU. YOU MUST FILE YOUR DEFENSE WITH THE CLERK OF THE COURT AND SEND A COPY TO THE PLAINTIFF'S ATTORNEY AT THE ADDRESS LISTED BELOW. IF YOU FAIL TO DEFEND THIS ACTION BY THE ABOVE DATE, JUDGMENT BY DEFAULT CAN BE RENDERED AGAINST YOU FOR THE RELIEF SOUGHT IN THE COMPLAINT.		
Attorney for plaintiff or plaintiff if filing Pro Se: (Name, address & telephone number)	FILED, ISSUED & ATTESTED	<i>MAR 24 2011</i>
J. David Wicker, Jr. W. Lee Corbett CORBETT CROCKETT 3100 West End Avenue, Suite 1050 Nashville, Tennessee 37203 (615) 383-0500	CRISTI SCOTT, Clerk and Master By: <i>[Signature]</i> 1 Public Square Suite 308 Nashville, TN 37201	<i>[Signature]</i>
Deputy Clerk & Master		
NOTICE OF DISPOSITION DATE		
The disposition date of this case is twelve months from date of filing. The case must be resolved or set for trial by this date or it will be dismissed by the Court for failure to prosecute pursuant to T.R.C.P. 41.02 and Local Rule 18.		
If you think the case will require more than one year to resolve or set for trial, you must send a letter to the Clerk and Master at the earliest practicable date asking for an extension of the disposition date and stating your reasons. Extensions will be granted only when exceptional circumstances exist.		
TO THE SHERIFF:	DATE RECEIVED	
	<i>Sheriff</i>	

***Submit one original plus one copy for each defendant to be served.

ADA Coordinator, Cristi Scott (862-5710)

RETURN ON SERVICE OF SUMMONS

I hereby return this summons as follows: (Name of Party Served) _____

Served _____
 Not Served _____

Not Found _____
 Other _____

DATE OF RETURN:

By:

Sheriff/or other authorized person to serve process

RETURN ON SERVICE OF SUMMONS BY MAIL

I hereby certify and return that on the 24 day of March, 2011, I sent, postage prepaid by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in case 11-1404-1 to the defendant Bruce C. Robins. On the 28 day of March, 2011, received the return receipt, which had been signed by Bruce Robins on the 26 day of March.

The return receipt is attached to this original summons to be filed by the Chancery Court Clerk & Master.

Sworn to and subscribed before me on this <u>25</u> day of <u>March</u> , 2011, in the County of <u>Davidson</u> , State of <u>Tennessee</u> .	Signature of Notary Public or Deputy Clerk
My Commission Expires	
NOTARY PUBLIC TENNESSEE My Commission Expires 10/2014	
PRIVILEGE OF PERSONAL PROPERTY EXEMPTION	

TO THE DEFENDANT(s):

Tennessee law provides a ten thousand dollar equity interest personal property seizure to satisfy a judgment. If a judge seizes your property in this action and you wish to claim a written list, under oath, of the items seized, file a written list, under oath, of the items with the clerk of the court. The list may be changed by you thereafter as necessary before the judgment becomes final, if the execution or garnishment issued prior to the judgment becomes final, the items are automatically exempt by law. These include items of necessary wear and your family and trunks or other necessary apparel, family portraits, the family Bible. Should any of these items be seized, you may recover them. If you do not understand this, you may wish to seek the advice of an attorney.

Mail list to: Clerk & Master
1 Public Square
Suite 308
Nashville TN 37201

Please state file number on list.

- Complete Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the envelope, or on the front if space permits.

1. Article Addressed to:

*Bruce C. Robins, Registered Agent
Robins Insurance Agency, Inc.
30 Burton Hills Blvd.
Nashville, TN 37215
Restricted Delivery
Postage: \$10.00*

2. Article Number
(Transfer from service label)

2011 0110 0001 9804 2593

CERTIFICATION (IF APPLICABLE)

I, Cristi Scott, Clerk & Master of the Chancery Court in the State of Tennessee, Davidson County, do certify this to be a true and correct copy of the original summons issued in this case.

CRISTI SCOTT, Clerk & Master

By:

D.C. & M.

A. Signature	<input checked="" type="checkbox"/> Agent
X	<input type="checkbox"/> Addressee
B. Received by (Printed Name)	C. Date of Delivery
<i>3/28/11</i>	03-28
D. Is delivery address different from item 1? If YES, enter delivery address below:	
<input type="checkbox"/> Yes	
<input type="checkbox"/> No	
CLERK & MASTER DAVIDSON COUNTY	
F.I.L.E.	
3. Service Type	
<input checked="" type="checkbox"/> Certified Mail	<input type="checkbox"/> Express Mail
<input type="checkbox"/> Registered	<input type="checkbox"/> Return Receipt for Merchandise
<input type="checkbox"/> Insured Mail	<input type="checkbox"/> C.O.D.
4. Restricted Delivery? (Extra Fee?)	
<input checked="" type="checkbox"/> Yes	

STATE OF TENNESSEE 20 TH JUDICIAL DISTRICT CHANCERY COURT	SUMMONS	FILE NUMBER <i>11-1104-H</i>
PLAINTIFF BELLE MEADE TOWER CONDOMINIUM ASSOCIATION	DEFENDANT BRUCE C. ROBINS, ROBINS INSURANCE AGENCY, INC., and TRAVELERS INSURANCE COMPANY	
TO: (NAME AND ADDRESS OF DEFENDANT)		
<p>Method of Service:</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Davidson Co. Sheriff <input type="checkbox"/> *Comm. Of Insurance <input type="checkbox"/> *Secretary of State <input type="checkbox"/> *Out of County Sheriff <input type="checkbox"/> Private Process Server <input type="checkbox"/> Other</p> <p>*Attach Required Fees</p>		
<p>BRUCE C. ROBINS, Registered Agent for ROBINS INSURANCE AGENCY, INC. 30 Burton Hills Blvd Nashville, TN 37215</p> <p>List each defendant on a separate summons.</p> <p>YOU ARE SUMMONED TO DEFEND A CIVIL ACTION FILED AGAINST YOU IN CHANCERY COURT, DAVIDSON COUNTY, TENNESSEE. YOUR DEFENSE MUST BE MADE WITHIN THIRTY (30) DAYS FROM THE DATE THIS SUMMONS IS SERVED UPON YOU. YOU MUST FILE YOUR DEFENSE WITH THE CLERK OF THE COURT AND SEND A COPY TO THE PLAINTIFF'S ATTORNEY AT THE ADDRESS LISTED BELOW. IF YOU FAIL TO DEFEND THIS ACTION BY THE ABOVE DATE, JUDGMENT BY DEFAULT CAN BE RENDERED AGAINST YOU FOR THE RELIEF SOUGHT IN THE COMPLAINT.</p>		
Attorney for plaintiff or plaintiff if filing Pro Se: (Name, address & telephone number) J. David Wicker, Jr. W. Lee Corbett CORBETT CROCKETT 3100 West End Avenue, Suite 1050 Nashville, Tennessee 37203 (615) 383-0500	FILED, ISSUED & ATTESTED CRISTI SCOTT, Clerk and Master By: <i>[Signature]</i> 1 Public Square Suite 308 Nashville, TN 37201 Deputy Clerk & Master <i>[Signature]</i>	MAR 24 2011
NOTICE OF DISPOSITION DATE		
<p>The disposition date of this case is twelve months from date of filing. The case must be resolved or set for trial by this date or it will be dismissed by the Court for failure to prosecute pursuant to T.R.C.P. 41.02 and Local Rule 18.</p> <p>If you think the case will require more than one year to resolve or set for trial, you must send a letter to the Clerk and Master at the earliest practicable date asking for an extension of the disposition date and stating your reasons. Extensions will be granted only when exceptional circumstances exist.</p>		
TO THE SHERIFF:	DATE RECEIVED	
	Sheriff	

***Submit one original plus one copy for each defendant to be served.

ADA Coordinator, Cristi Scott (862-5710)

RETURN ON SERVICE OF SUMMONS

I hereby return this summons as follows: (Name of Party Served) _____

Served _____
 Not Served _____

Not Found _____
 Other _____

DATE OF RETURN:

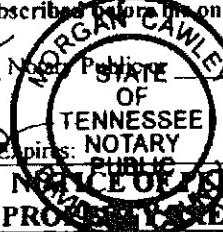
By:

Sheriff/or other authorized person to serve process

RETURN ON SERVICE OF SUMMONS BY MAIL

I hereby certify and return that on the 24 day of March, 2011, I sent, postage prepaid, by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in case ANDY GORE LLC v. C.R. CO. LTD to the defendant Keiths Insurance Agency. On the 28 day of March, 2011, I received the return receipt, which had been signed by Bruce C. Robins on the 26 day of March, 2011.

The return receipt is attached to this original summons to be filed by the Chancery Court Clerk & Master.

Sworn to and subscribed before me on this <u>24</u> day of <u>March</u> , 2011.	
Signature of <input checked="" type="checkbox"/> Notary Public - Deputy Clerk	
 Morgan Cawley Notary Public State of Tennessee Commission Expires: NOTARY PUBLIC NOTICE OF PERSONAL PROPERTY EXEMPTION	

Signature of plaintiff, plaintiff's attorney or other person authorized by statute to serve process

TO THE DEFENDANT(S):

Tennessee law provides a debtor's equity interest personal seizure to satisfy a judgment. You in this action and you wish file a written list, under oath, with the clerk of the court. This can be changed by you thereafter a before the judgment becomes execution or garnishment issues items are automatically exempt these include items of necessaries and your family and trunks or such apparel, family portraits, etc. Should any of these items be seized, you may wish to seek to recover them. If you do not want to exercise it, you may wish to seek

- Complete Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the envelope, or on the front if space permits.

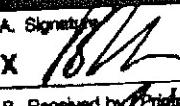
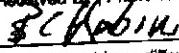
Mail list to: Clerk & Master
 1 Public Square
 Suite 308
 Nashville TN 37201

Bruce C. Robins
 30 Burton Hills Blvd.
 Nashville, TN 37215

Restricted Delivery
 Postage: ~~\$0.99~~ \$0.99

2. Article Number
 (Transfer from service label)

PS Form 3811, February 2004

A. Signature 	<input type="checkbox"/> Agent <input type="checkbox"/> Addressee
B. Received by (Printed Name) 	C. Date of Delivery <u>03-20</u>
D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
2011 MAR 28 CLERK AYDSON	
3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
4. Restricted Delivery (Extra Fee) <input type="checkbox"/> Yes	

7011 0110 3000 9804 2586

102506-02-44-1340

Please state file number on list.

Domestic Return Receipt

CERTIFICATION (IF APPLICABLE)

I, Cristi Scott, Clerk & Master of the Chancery Court in the State of Tennessee, Davidson County, do certify this to be a true and correct copy of the original summons issued in this case.

CRISTI SCOTT, Clerk & Master

By:

D.C. & M.

ORIGINAL

STATE OF TENNESSEE 20 TH JUDICIAL DISTRICT CHANCERY COURT	SUMMONS	CASE FILE NUMBER <i>11-004-IV</i>
PLAINTIFF BELLE MEADE TOWER CONDOMINIUM ASSOCIATION	DEFENDANT BRUCE C. ROBINS, ROBINS INSURANCE AGENCY, INC., and TRAVELERS INSURANCE COMPANY	
TO: (NAME AND ADDRESS OF DEFENDANT)		Method of Service:
TRAVELERS INSURANCE COMPANY, with service through Department of Commerce and Insurance - Commissioner 500 James Robertson Parkway, 5 th Floor Nashville, TN 37243		G Certified Mail G Davidson Co. Sheriff G *Comm. Of Insurance G *Secretary of State G *Out of County Sheriff G Private Process Server G Other
List each defendant on a separate summons.		
*Attach Required Fees		
YOU ARE SUMMONED TO DEFEND A CIVIL ACTION FILED AGAINST YOU IN CHANCERY COURT, DAVIDSON COUNTY, TENNESSEE. YOUR DEFENSE MUST BE MADE WITHIN THIRTY (30) DAYS FROM THE DATE THIS SUMMONS IS SERVED UPON YOU. YOU MUST FILE YOUR DEFENSE WITH THE CLERK OF THE COURT AND SEND A COPY TO THE PLAINTIFF'S ATTORNEY AT THE ADDRESS LISTED BELOW. IF YOU FAIL TO DEFEND THIS ACTION BY THE ABOVE DATE, JUDGMENT BY DEFAULT CAN BE RENDERED AGAINST YOU FOR THE RELIEF SOUGHT IN THE COMPLAINT.		
Attorney for plaintiff or plaintiff if filing Pro Se: (Name, address & telephone number) J. David Wicker, Jr. W. Lee Corbett CORBETT CROCKETT 3100 West End Avenue, Suite 1050 Nashville, Tennessee 37203 (615) 383-0500	FILED, ISSUED & ATTESTED By: CRISTI SCOTT, Clerk and Master 1 Public Square Suite 308 Nashville, TN 37201 <i>[Signature]</i> Deputy Clerk & Master	MAR 24 2011
NOTICE OF DISPOSITION DATE		
<p>The disposition date of this case is twelve months from date of filing. The case must be resolved or set for trial by this date or it will be dismissed by the Court for failure to prosecute pursuant to T.R.C.P. 41.02 and Local Rule 18.</p> <p>If you think the case will require more than one year to resolve or set for trial, you must send a letter to the Clerk and Master at the earliest practicable date asking for an extension of the disposition date and stating your reasons. Extensions will be granted only when exceptional circumstances exist.</p>		
TO THE SHERIFF:	DATE RECEIVED	
	Sheriff	

***Submit one original plus one copy for each defendant to be served.

ADA Coordinator, Cristi Scott (862-5710)

RETURN ON SERVICE OF SUMMONS

I hereby return this summons as follows: (Name of Party Served)

Served 3/30/11

Not Found Information

Other _____

DATE OF RETURN:

3/30/11

By:

Chrsty Daniel
Sheriff or other authorized person to serve process

Special

RETURN ON SERVICE OF SUMMONS BY MAIL

I hereby certify and return that on the _____ day of _____, 20____, I sent, postage prepaid, by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in case _____ to the defendant _____. On the _____ day of _____, 20____, I received the return receipt, which had been signed by _____ on the _____ day of _____, 20____.

The return receipt is attached to this original summons to be filed by the Chancery Court Clerk & Master.

Sworn to and subscribed before me on this _____ day of _____, 20____.
Signature of _____ Notary Public or Deputy Clerk

Signature of plaintiff, plaintiff's attorney or other person authorized by statute to serve process.

My Commission Expires:

NOTICE OF PERSONAL PROPERTY EXEMPTION

TO THE DEFENDANT(S):

Tennessee law provides a ten thousand dollar (\$10,000.00) debtor's equity interest personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

ATTACH
RETURN
RECEIPT
HERE
(IF APPLICABLE)

Mail list to: Clerk & Master
1 Public Square
Suite 308
Nashville TN 37201

Please state file number on list.

CERTIFICATION (IF APPLICABLE)

I, Cristi Scott, Clerk & Master of the Chancery Court in the State of Tennessee, Davidson County, do certify this to be a true and correct copy of the original summons issued in this case.

CRISTI SCOTT, Clerk & Master

By:

D.C. & M.